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Via ECF

May 23, 2023

Honorable Taryn A. Merkl, U.S.M.J.
United States District Court Eastern District of New York
225 Cadman Plaza East
Brooklyn, New York 11201

Re: Star Auto Sales of Bayside, Inc., et al. v. Voynow, Bayard, Whyte and Co., LLP, et al.
Case No.: 1:18-cv-5775 (ERK) (TAM)

Dear Judge Merkl:

This firm represents the Plaintiffs. Plaintiffs respectfully request that the Court strike Defendants' request for a pre-motion conference related to two (2) purported discovery issues (ECF Doc. No. 99) because Defendants failed to comply with this Court's individual rules that require the parties to submit a joint letter to the Court concerning any discovery disputes that they are unable to resolve after meeting and conferring. Defendants failed to submit a joint letter and failed to meet and confer in any regard regarding their anticipated motion to preclude Plaintiffs from relying on expert testimony. Their request is in violation of this Court's individual rules, is premature, and should be stricken.

In the alternative, Plaintiffs request leave to file a letter in opposition on or before June 2, 2023.

Respectfully submitted,

MILMAN LABUDA LAW GROUP PLLC

/s/ Jamie S. Felsen

cc: All counsel of record